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Mimi Ventures LLC, and Eric M. Chen*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DEUTSCHE BANK NATIONAL TRUST
COMPANY, as trustee for Washington
Mutual Mortgage Pass-Through
Certificates Series 2004-AR10;

Plaintiff,

vs.

PREMIER ONE HOLDINGS, INC.;
ANTHEM COUNTRY CLUB
ASSOCIATION, INC. ; MIMI VENTURES
LLC ; ERIC M. CHEN;

Defendants,

AND ALL RELATED MATTERS.

Case No.: 2:16-cv-02805-JCM-PAL

STIPULATION AND ORDER TO STAY DISCOVERY

Defendants, Premier One Holdings, Inc. ("Premier"), Mimi Ventures, LLC
("Mimi"), and Eric M. Chen ("Chen") by and through Sarah A. Morris, Esq. and
Timothy A. Wiseman, Esq. of the law firm Morris Law Center; Deutsche Bank National
Trust Company, As trustee for Washington Mutual Mortgage Pass-Through

Certificated Series 2004-AR10 ("Plaintiff") by and through Sylvia O. Semper, Esq. of the law firm Ballard Spahr; Defendant, Anthem Country Association Club, Inc., by and through Julie Funai, Esq., of Lipson Neilson Cole Seltzer & Garin, P.C., hereby agree and stipulate as follows:

IT IS HEREBY AGREED AND STIPULATED, that the parties jointly request an Order staying all discovery for 90 days as the parties are conducting settlement discussions and hope to settle this case.

The parties have good cause for requesting the stay due to ongoing settlement negotiations. The parties believe a stay of the matter to be appropriate to conserve judicial resources. The parties have entered into the agreement in good faith and not for purposes of delay.

IT IS FURTHER AGREED AND STIPULATED that once the stay is lifted, any remaining parties will submit a renewed discovery schedule 30-days from the date the stay is lifted.

Dated: January 5, 2018

MORRIS LAW CENTER

By: /s/ Timothy A. Wiseman
Sarah A. Morris, Esq.
Nevada Bar No. 8461
Timothy A. Wiseman, Esq.
Nevada Bar No. 13786
Attorneys for Defendant, Premier One Holdings, Inc., Mimi Ventures LLC, and Eric M. Chen.

Dated: January 10, 2018

BALLARD SPAHR LLP

By: /s/ Scott A. Wiseman
Abran E. Vigil, Esq.
Nevada Bar No. 7548
Sylvia O. Semper, Esq.
Nevada Bar No. 12863
Attorneys for Plaintiff

1 Dated: January 10, 2018

2 LIPSON NEILSON COLE SELTZER
3 & GARIN, P.C.

4 By: /s/ Julie Funai
5 Julie Funai, Esq.
6 Nevada Bar No. 8725
7 9900 Covington Cross Drive, Suite
8 120, Las Vegas, NV 89144
9 *Attorneys for Anthem Country*
10 *Association Club, Inc*

8 **ORDER**

9 **IT IS ORDERED** that this case is stayed for 90 days, or until **April 12, 2018**.
10 **IT IS FURTHER ORDERED** that the parties shall have until **May 14, 2018**, to
11 submit a renewed discovery schedule if the case has not settled.

12 Dated: February 8, 2017

13 
14 UNITED STATES MAGISTRATE JUDGE

14 Respectfully submitted:

15 By: /s/ Timothy A. Wiseman
16 Timothy A. Wiseman
17 Nevada Bar No. 13786
18 *Attorneys for Defendant, Premier One*
19 *Holdings, Inc., Mimi Ventures LLC,*
20 *and Eric M. Chen.*

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO STAY DISCOVERY** by the method indicated:

BY FAX: by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).

BY E-MAIL: by transmitting via e-mail the document(s) listed above to the email addresses set forth below and/or included on the Court's Service List for the above-referenced case.

BY U.S. MAIL: by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.

BY OVERNIGHT MAIL: by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.

BY PERSONAL DELIVERY: by causing personal delivery via messenger service of the document(s) listed above to the person(s) at the address(es) set forth below.

 X
BY ELECTRONIC SUBMISSION: submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

and addressed to the following:

Lipson Neilson Cole Seltzer & Garin, P.C.
Julie Funai jwhitmanfunai@lipsonneilson.com

Ballard Spahr LLP
Sylvia O. Semper sempers@ballardspahr.com
Joel Edward Tasca tasca@ballardspahr.com
Abran A. Vigil vigila@ballardspahr.com

Dated this 9th day of January, 2018.



An employee of Morris Law Center